

1 Antonio Valla, Esq. (SBN 136256)
2 Stefano Abbasciano, Esq. (SBN 277680)
3 VALLA & ASSOCIATES, INC., P.C.
333 Bush Street, Suite 2020
San Francisco, CA 94104
Telephone: 415.856.9001

5 Maxim H. Waldbaum, Esq. (SBN 1532795)
Admitted *pro hac vice*
6 3 Park Avenue, 15th Floor
New York, NY 10016
7 Telephone: 917.603.3905

8 Attorneys for Plaintiffs
9 Marco Bicego USA, Inc. and Marco Bicego S.p.A.

10 Sean M. Sullivan (CA SBN 229104)
John D. Freed (CA SBN 261518)
11 DAVIS WRIGHT TREMAINE LLP
505 Montgomery Street, Suite 800
12 San Francisco, California 94111
13 Telephone: 415.276.6500

14 Attorneys for Defendants
Kantis Holdings, LLC; Stephanie Kantis

15 **UNITED STATES DISTRICT COURT**
16
17 **NORTHERN DISTRICT OF CALIFORNIA**

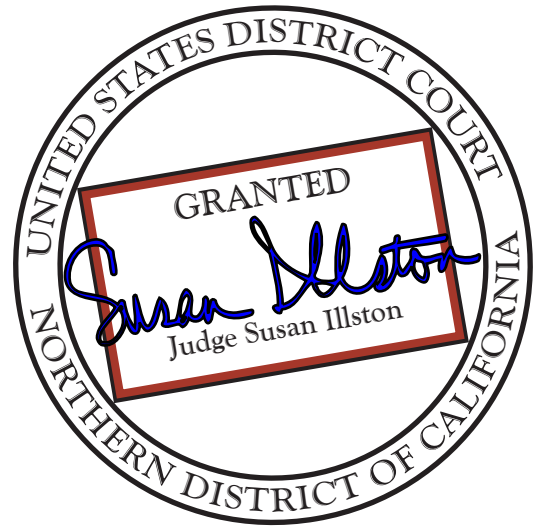
18 MARCO BICEGO USA, INC., a Delaware
corporation, and MARCO BICEGO S.P.A., an
19 Italian company,

20 Plaintiffs,

21 vs.

22
23 KANTIS HOLDINGS, LLC, a Delaware
limited liability company, STEPHANIE
24 KANTIS, an individual, and DOES 1 through
100, inclusive,

25 Defendants.
26
27
28



CASE NO: 3:17-cv-00927-SI

**JOINT STIPULATION TO DISMISS
ACTION IN ITS ENTIRETY WITH
PREJUDICE**

1 Pursuant to Federal Rule of Civil Procedure Rule 41(a)(1)(A)(ii), Plaintiffs Marco
2 Bicego USA, Inc. and Marco Bicego S.p.A. and Defendants Kantis Holdings, LLC and Stephanie
3 Kantis respectfully request that the Court dismiss this action in its entirety with prejudice, with each
4 party bearing their own costs and fees.

5
6 IT IS SO STIPULATED.

7
8 DATED: May 4, 2018

Respectfully submitted,

VALLA & ASSOCIATES, INC., P.C.

9 /s/ Stefano Abbasciano
10 Stefano Abbasciano, Esq.
11 Attorneys for Plaintiffs Marco Bicego USA, Inc.
and Marco Bicego, S.p.A.

12
13 /s/ Maxim H. Waldbaum
Maxim H. Waldbaum, Esq.
14 Admitted *pro hac vice*
15 Attorney for Plaintiffs Marco Bicego USA, Inc.
and Marco Bicego, S.p.A.

16 DAVIS WRIGHT TREMAINE LLP

17 /s/ Sean M. Sullivan
18 Sean M. Sullivan
19 Attorneys for Defendants
Kantis Holdings LLC and Stephanie Kantis

20 DAVIS WRIGHT TREMAINE LLP

21 /s/ John D. Freed
22 John D. Freed
23 Attorneys for Defendants
Kantis Holdings LLC and Stephanie Kantis

I, Stefano Abbasciano, attest that concurrence in the filing of this Joint Case Management Statement has been obtained from the other signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of May, 2018, at San Francisco, California.

/s/ Stefano Abbasciano
Stefano Abbasciano, Esq.
Attorneys for Plaintiffs Marco Bicego USA, Inc.
and Marco Bicego, S.p.A.